

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

IN RE: CAMP LEJEUNE WATER)
LITIGATION) No. :
_____) 7:23-CV-897
THIS DOCUMENT RELATES TO:)
ALL CASES)

WEDNESDAY, DECEMBER 6, 2023
CONFIDENTIAL INFORMATION
SUBJECT TO PROTECTIVE ORDER

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Oral deposition of 30(b)(6)
designee of Department of Veterans Affairs,
Patricia R. Hastings, M.D., held at the
Department of Veteran Affairs, 810 Vermont
Avenue NW, Washington, DC, commencing at
10:00 a.m. Eastern, on the above date, before
Carrie A. Campbell, Registered Diplomat
Reporter, and Certified Realtime Reporter.

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1 to issues of water contamination in Camp
2 Lejeune, is there any way like to search a
3 hard drive, search a database, search a file,
4 a share drive file, whatever, where documents
5 might be stored to locate things?

6 MS. HURT: Objection to form.

7 THE WITNESS: I'm not aware of
8 any -- people make their own
9 SharePoints or, you know, SharePoints
10 are sort of ubiquitous now but a few
11 years ago they weren't. And many
12 people make their own files that they
13 keep in their own computer.

14 Some people have share files.
15 I do not know of a central repository
16 for all things Camp Lejeune.

17 QUESTIONS BY MR. DEAN:

18 Q. Okay. Do you have any
19 folders --

20 A. Yes.

21 Q. -- or files that relate to Camp
22 Lejeune --

23 A. Yes.

24 Q. -- that are shared in your
25 department?

1 A. Not shared, but I have files on
2 my computer for reviews of -- I've been
3 working with Camp Lejeune for seven years.

4 Q. Do you know how -- what is that
5 file called, that master file folder?

6 A. It probably is called Camp
7 Lejeune. I would have to -- you know, I --
8 I --

9 Q. Right.

10 A. I would have to go in and look
11 at it.

12 Q. Okay. And is it on a laptop or
13 on a VA file server?

14 MS. HURT: Objection. Scope.

15 THE WITNESS: It's on my
16 laptop.

17 QUESTIONS BY MR. DEAN:

18 Q. And is this a work laptop?

19 A. Yes.

20 Q. All right. And does the VA
21 have various personnel that have mobile
22 laptops where they may keep information from
23 time to time that they save on their laptop
24 that is personal to them related to Camp
25 Lejeune?

1 QUESTIONS BY MR. DEAN:

2 Q. And nobody has asked you --
3 whether it be Office of General Counsel, the
4 Department of Justice or any of your
5 superiors, nobody has asked you to provide
6 that information?

7 MS. HURT: Objection to scope.

8 THE WITNESS: I have a letter
9 that tells me not to destroy anything.
10 So they have not asked me to produce
11 anything, but I have been told --

12 QUESTIONS BY MR. DEAN:

13 Q. Understood.

14 A. -- that you are -- you know,
15 that I am to save things.

16 Q. Okay.

17 A. And not delete.

18 Q. But nobody has asked you for
19 them yet?

20 A. They have not asked me for
21 them.

22 Q. And the letter you got was a
23 hold notice?

24 A. I believe that's what it's
25 called.